

IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE  
FOR THE MIDDLE DISTRICT  
NASHVILLE DIVISION

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JANE DOE, )  
)  
Plaintiff, )  
)  
v. ) No. 3:20-CV-01023  
) Jury Demand  
THE METROPOLITAN ) Judge Trauger  
GOVERNMENT OF NASHVILLE AND ) Magistrate Judge  
DAVIDSON COUNTY, TENNESSEE ) Holmes  
AND DR. ADRIENNE BATTLE ) Lead Case  
)  
Defendants. )  
-----

DR. LILY MORENO LEFFLER, )  
)  
Plaintiff, )

v. )  
)  
THE METROPOLITAN )  
GOVERNMENT OF NASHVILLE AND )  
DAVIDSON COUNTY, TENNESSEE, )  
AND DR. ADRIENNE BATTLE )  
)  
Defendants. )  
-----

DR. JAMES BAILEY, )  
DR. PIPPA MERIWETHER, and )  
DR. DAMON CATHEY, )  
)  
Plaintiffs, )

v. )  
)  
METROPOLITAN GOVERNMENT )  
OF NASHVILLE AND DAVIDSON )  
COUNTY, TENNESSEE and )  
DR. ADRIENNE BATTLE, )  
)  
Defendants. )  
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The Deposition of: BRIAN MELLS  
April 13, 2022

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1           The deposition of Brian Mells was taken by  
2 counsel for the Plaintiffs, by notice, via remote  
3 means, in Nashville, Tennessee, on April 13, 2022,  
4 pursuant to the provisions of the Federal Rules of  
5 Civil Procedure.

6           All formalities as to notice, caption,  
7 certificate, reading and signing of the deposition  
8 are not waived. All objections, except as to the  
9 form of the questions, are reserved to the hearing.

10 -----  
11  
12 APPEARANCES:

13 For the Plaintiffs:

14       Dr. James Bailey  
15       Dr. Lily Leffler  
16       Dr. Pippa Meriwether  
17       Jane Doe

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1                                    BRIAN MELLS,  
2    called as a witness and, having been first duly  
3    sworn, was deposed as follows:

4    EXAMINATION BY MS. STEINER:

5            Q.    State your full name for the record?

6            A.    Brian Jeffrey Mells.

7            Q.    And, Mr. Mells, what is your home address?

8            A.    I can't hear you that well. You have an  
9    echo coming on.

10          Q.    Home address? What is your home address?

11          A.    [REDACTED], Smyrna, Tennessee.

12          Q.    How do you spell that?

13                  MR. FOX: Ms. Steiner, it's a little hard  
14    to hear you. (Off-the-record discussion.)

15    BY MS. STEINER:

16          Q.    Dr. Mells, can you hear me?

17          A.    I can hear you.

18          Q.    Now, where do you live?

19          A.    [REDACTED], Smyrna, Tennessee.

20          Q.    How do you spell that?

21          A.    [REDACTED].

22          Q.    Then [REDACTED]?

23          A.    Yes, ma'am.

24          Q.    Do you have any plans of moving in the  
25    near future?

1 A. Yes, ma'am.

2 Q. Where are you moving to?

3 A. I don't know the address of our house. It  
4 is being built. I don't know the address.

5 Q. Where is it being built, what county?

6 A. Rutherford.

7 Q. Do you know the road it's on?

8 A. Repeat that.

9 Q. What road is it on?

10 A. [REDACTED].

11 Q. And what part of Rutherford County is it  
12 in?

13 A. Murfreesboro.

14 Q. Okay. Are you married?

15 A. Yes.

16 Q. What is your wife's name?

17 A. Rochelle Mells.

18 Q. Where does she work?

19 A. Fortis Institute.

20 Q. Where?

21 A. Fortis Institute.

22 Q. How do you spell that?

23 A. F-O-R-T-I-S.

24 Q. Where is that located?

25 A. Nashville.

1 Q. Now, do you know when approximately you're  
2 going to move into your new home?

3 A. Approximately the end of the summer, but  
4 it could be different.

5 Q. We're going to try this case starting  
6 December 6th, okay? And we will probably be issuing  
7 subpoenas in advance, okay? And so then if we  
8 can't -- Dr. Mells, can you hear me? I can't hear  
9 you.

10 A. Yes, ma'am.

11 Q. Now, if we needed to contact you, who is  
12 your nearest relative that you would have?

13 A. My wife.

14 Q. And does she have any plans of leaving  
15 Fortis Institute in the near future?

16 A. Not in the near future.

17 Q. What about by the end of the year?

18 A. Not by the end of the year.

19 Q. Okay. Now, Dr. Mells, I'm Ann Steiner and  
20 I represent four of the plaintiffs in this lawsuit.  
21 I represent Dr. Pippa Meriwether, Dr. Lily Leffler,  
22 (name spoken off record) who we're going to call  
23 Jane Doe, okay, and Dr. James Bailey. And Jesse  
24 Harbison is here, too, and she represents Dr. Damon  
25 Cathey. We've all -- all the plaintiffs have sued

1 Metro schools for retaliation, okay?

2 Now, we're going to ask you a whole bunch  
3 of questions today. If you do not understand my  
4 question or if you can't hear my question, let me  
5 know immediately and we'll make sure that you  
6 properly understand it, because I don't want to get  
7 into trial and have you say, well, I couldn't hear  
8 your question. You need to let me know today, okay?

9 A. Okay.

10 Q. Now, have you ever given a deposition  
11 before?

12 A. Yes.

13 Q. How many times?

14 A. Once.

15 Q. What type of case?

16 A. Repeat that question.

17 Q. What type of a case?

18 A. I don't know what type of a case it was.

19 Q. Why did you have to give a deposition?

20 A. I was on staff at a school.

21 Q. Was it a Metro school?

22 A. Yes.

23 Q. Do you recall what you were asked  
24 questions about?

25 A. Asked questions about a student.



1 Q. And what about that student?

2 A. Was any neglect found with that student.

3 Q. Was it a federal claim?

4 A. I don't know.

5 Q. Okay. Did you testify that there was  
6 neglect with the student or there was not?

7 A. There was not.

8 Q. So there was not anything Metro schools  
9 had done wrong with regard to that student that you  
10 testified to, correct?

11 A. Correct.

12 Q. Do you recall what he testified?

13 A. No.

14 Q. Do you recall who opposing counsel was?

15 A. I don't remember the name.

16 Q. Was it a male or a female?

17 A. Male.

18 Q. Was it Gary Blackburn?

19 A. No.

20 Q. Was it Stephen Crofford?

21 A. No.

22 Q. Okay. Do you recall who represented  
23 Metro?

24 A. I don't.

25 Q. Do you recall the year of the testimony?

1 A. No.

2 Q. What school did it involve?

3 A. Pearl Cohn.

4 Q. What was your position at Pearl Cohn?

5 A. Assistant principal.

6 Q. Who was the principal?

7 A. Sonia Stewart.

8 Q. Now, have you ever accused Metro schools  
9 of retaliation?

10 A. No.

11 Q. Have you ever accused Metro schools of any  
12 form of discrimination, whether it be based on race,  
13 sex, age, national origin against either you or  
14 anyone else?

15 A. No.

16 Q. Have you ever been involved in any claim  
17 or allegation against Dr. Battle's brother, Coach  
18 Battle?

19 A. No.

20 Q. Are you related or do you have any sort of  
21 an association with anyone else who has engaged in  
22 some sort of protected activity based on their race,  
23 sex, age or national origin?

24 A. Could you repeat the question.

25 Q. Do you have any association or connection,

1 for instance, best friend, relative who has accused  
2 Metro schools of any sort of discrimination?

3 A. No.

4 Q. Okay. Now it's my understanding that  
5 yesterday you were named teacher of -- principal of  
6 year; is that correct?

7 A. It was on Monday evening.

8 Q. Who picked you for that, was that Dr.  
9 Battle?

10 A. I don't know how the selection process is  
11 completed for principal of year.

12 Q. Do you know whether or not Dr. Battle has  
13 the final say as to who is principal of the year?

14 A. I don't know the selection process.

15 Q. Did anyone tell you why you were picked as  
16 principal of year?

17 A. No.

18 Q. Now, how did you come about interviewing  
19 for principal of White's Creek?

20 A. I was selected after I applied for the  
21 position.

22 Q. Did anyone request that you apply for the  
23 position?

24 A. No.

25 Q. Who interviewed you?

1           A.     Who -- there was a lot of people on that  
2 interview. I don't know. There were some teachers.  
3 I don't know their exact names. I can't remember  
4 them. There were some community partners. There  
5 were central office staff. I had two interviews,  
6 yeah.

7           Q.     Okay. Do you know whether or not anyone  
8 at Metro schools keeps track of who interviews you?

9           A.     I don't know.

10          Q.     Do you know whether or not you were  
11 scored?

12          A.     I don't.

13          Q.     Now, I want to ask you a little bit about  
14 your career. Where did you go to college?

15          A.     University of Tennessee.

16          Q.     When did you graduate?

17          A.     2006.

18          Q.     Where are you from?

19          A.     Memphis, Tennessee.

20          Q.     Did you go to the public school system  
21 there?

22          A.     Yes.

23          Q.     What year did you get out of high school?

24          A.     2002.

25          Q.     2002. Okay. So what was your degree from

1 UT?

2 A. Bachelor's of science and mathematics.

3 Q. And then where did you go?

4 A. To college after that?

5 Q. Yes.

6 A. I went to Trevecca Nazarene.

7 Q. What was your degree there?

8 A. Master's in education leadership.

9 Q. Do you have a PhD or any other further  
10 education?

11 A. Yes.

12 Q. What?

13 A. I have Ed.S in curriculum and instruction  
14 and an Ed.D in curriculum and instruction.

15 Q. When did you graduate from Trevecca and  
16 get your master's?

17 A. 2000 -- I don't want to give you the wrong  
18 date.

19 Q. Can we break for just ten seconds? Off  
20 the record.

21 (Off-the-record discussion held.)

22 BY MS. STEINER:

23 Q. Dr. Mells, where did you get your Ed.S?

24 A. Carson-Newman University.

25 Q. Is that in eastern Tennessee?

1 A. Yes.

2 Q. Was it -- did you go there to attend or  
3 was it online?

4 A. Online.

5 Q. Okay. When did you get your two degrees  
6 from Carson-Newman?

7 A. I don't want to quote you incorrectly.

8 Q. Just about. I'm not going to hold you to  
9 it.

10 A. Okay. 2016 and 2017 sounds like the right  
11 dates.

12 Q. Okay. When did you start working for  
13 Metro schools?

14 A. January of 2007.

15 Q. What was your position?

16 A. Mathematics teacher.

17 Q. What grade?

18 A. Ninth grade.

19 Q. What school?

20 A. Hillwood High School.

21 Q. How long did you stay at Hillwood?

22 A. Six school years.

23 Q. What was your last position at Hillwood?

24 A. Mathematics teacher.

25 Q. That was 2007 through 2013?

1           A.     The school years end, so it was kind of --  
2     it was 2007 to 2012. 2007 was still in the middle  
3     of a school year.

4           Q.     And so in 2012, where did you go?

5           A.     Pearl Cohn.

6           Q.     What was your position at Pearl Cohn?

7           A.     Assistant principal.

8           Q.     How long did you stay assistant principal  
9     at Pearl Cohn?

10          A.     Four years.

11          Q.     Then where do you go?

12          A.     Madison.

13          Q.     You went to Madison about 2016?

14          A.     Yes.

15          Q.     Now, when you were at Pearl Cohn, was that  
16     a priority school?

17          A.     Yes.

18          Q.     Who was the principal?

19          A.     Sonia Stewart.

20          Q.     Sonia Stewart?

21          A.     Yes.

22          Q.     And who is the current principal at Pearl  
23     Cohn?

24          A.     Miriam Harrington.

25          Q.     Is Pearl Cohn still a priority school?

1 A. No, ma'am.

2 Q. Pearl Cohn is no longer a priority school?

3 A. That's correct.

4 Q. Are you sure?

5 A. Positive.

6 Q. When did it come out of priority status?

7 A. Don't quote me. I don't know the exact  
8 year.

9 Q. I want to show you an Excel spreadsheet  
10 that was given to me by Metro schools. I'm going to  
11 share this with you. Can you see this?

12 A. Yes.

13 Q. Okay. This is a list of the schools that  
14 were priority schools at Metro. If you go down here  
15 to Pearl Cohn, it says it's been a priority school  
16 from 2014; do you see that?

17 A. Yes.

18 Q. But you're telling me it is no longer a  
19 priority school?

20 A. Correct.

21 Q. Because this does not show, I do not  
22 believe -- this shows, it says it's been a priority  
23 school from 2014 through the present date. Are you  
24 telling me that it's not?

25 A. Correct.



1 Q. And what year did it come out of priority  
2 status?

3 A. I don't know the exact year.

4 Q. Okay.

5 MS. STEINER: Let's have the spreadsheet  
6 marked Exhibit number 1 just for identification  
7 purposes.

8 (WHEREUPON, the  
9 previously-mentioned document was  
10 marked for identification as  
11 Exhibit Number 1.)

12 BY MS. STEINER:

13 Q. Do you recognize this spreadsheet?

14 MR. FOX: No objection.

15 BY MS. STEINER:

16 Q. Do you recognize this spreadsheet, Dr.  
17 Mells?

18 A. No. I haven't seen this spreadsheet  
19 before.

20 Q. Now, I'll ask you one question. Do you  
21 know if Maplewood is on the priority school list?

22 A. Yes.

23 Q. What high schools are currently on the  
24 priority school list?

25 A. Maplewood and White's Creek.

1 Q. Is Madison Elementary where you were at,  
2 was that on the priority school list when you were  
3 there?

4 A. I was not at Madison Elementary.

5 Q. What school were you at?

6 A. Madison Middle School.

7 Q. Madison Middle School, was that on the  
8 priority list?

9 A. Yes.

10 Q. Do you know if it's currently on the  
11 priority list?

12 A. Yes.

13 Q. What does being on the priority list mean?

14 A. Means that the school is the bottom  
15 5 percent of the state.

16 Q. Does that sometimes have a lot to do with  
17 the schools that feed into the school that priority?

18 A. It could.

19 Q. Meaning right now, you're at White's Creek  
20 and it's priority, correct?

21 A. Correct.

22 Q. And the schools that feed into White's  
23 Creek, do those tend to be priority schools?

24 A. Yes.

25 Q. What are some of the schools that feed

1 into White's Creek?

2 A. Haynes, Brick Church, I.T. Creswell.

3 Q. And are those priority schools?

4 A. Not all.

5 Q. Which ones are priority?

6 A. Haynes and Brick Church.

7 Q. So the Creswell is not priority?

8 A. Correct.

9 Q. Which ones feed in the largest number of  
10 students to White's Creek?

11 A. Haynes is number one, and I don't want you  
12 to quote me, so I can't tell you who is number two  
13 between the other two.

14 Q. Now, when you're getting these students  
15 that are coming in from priority schools, as a  
16 practical matter, does that mean they are a little  
17 bit -- they are behind in terms of learning, those  
18 students who are feeding into other schools like  
19 Hillwood or Hillsboro?

20 A. Could be.

21 Q. So then when they feed into your school,  
22 you've got a lot of catching up to do with those  
23 students, correct?

24 A. Yeah.

25 Q. Now, Dr. Bailey has told me that some of

1 the kids who came to White's Creek when he was there  
2 were actually coming out of the criminal justice  
3 system; do you have that going on?

4 A. Yes.

5 Q. And would you agree that it's very  
6 difficult to try to teach kids who have such a bad  
7 start in life?

8 A. I would disagree.

9 Q. But it is more difficult than kids who are  
10 feeding into the schools like Hillsboro, correct?

11 A. I disagree.

12 Q. Now, as a -- when you were at Madison  
13 Middle School, it was priority, too, correct?

14 A. Correct.

15 Q. And it still is today, correct?

16 A. Correct.

17 Q. Do you know whether or not it's made any  
18 improvements in its priority status?

19 A. Yes.

20 Q. How?

21 A. What do you mean, how?

22 Q. How can you tell it's improved?

23 A. Based on the state data.

24 Q. Now, for the state data that you've got  
25 there, was there any testing done for the year 2020

1 in the spring? Do you recall when COVID hit?

2 A. No. There was no testing.

3 Q. No testing. Okay. So then was it  
4 possible to tell whether or not a school was on  
5 priority status or off priority status in the year  
6 2020, the spring?

7 A. Yes.

8 Q. How?

9 A. The state gives you a designation still.

10 Q. So you still got designated, but what was  
11 it based on?

12 A. Previous years' data.

13 Q. So if you were priority from the previous  
14 year, you were priority for that year, correct?

15 A. Correct.

16 Q. So even if the kids may have learned more  
17 and gotten out of priority status, because there was  
18 no testing, you wouldn't know that, correct?

19 A. Could you repeat that question?

20 Q. For 2020, it's my understanding, based on  
21 your testimony, that if a school was priority for  
22 2019, into 2019, they stayed whatever designation  
23 they had at the end of the 2020 because there was no  
24 testing, correct?

25 A. Correct.

1 Q. So if you were priority in 2019, you  
2 stayed priority for 2020, correct?

3 A. Correct.

4 Q. If you are non-priority for 2019, you  
5 stayed non-priority for 2020, correct?

6 A. Correct.

7 Q. Okay. So what is your age?

8 A. 37.

9 Q. What's your date of birth?

10 A. May 21st.

11 Q. What year?

12 A. 1984.

13 Q. What math did you teach, what type of  
14 math?

15 A. All of them.

16 Q. Algebra, geometry, advanced?

17 A. Algebra, geometry, Algebra II,  
18 foundations, bridge math.

19 Q. Now, was it -- who was your executive --  
20 who did you report to when you were at Madison  
21 Middle?

22 A. Which year?

23 Q. The last year. 2020. 2019, 2020.

24 A. Renita Perry.

25 Q. Who would give you your evaluations?

1 A. An executive director.

2 Q. Ms. Perry?

3 A. Correct.

4 Q. Do you recall what your score was for the  
5 2019, 2020 school year?

6 A. No, I don't.

7 Q. Can you look it up real quick?

8 A. Do what?

9 Q. Can you look it up on your computer really  
10 quick to see what it was?

11 A. It was listed as a partial year exemption,  
12 P.Y.E.

13 Q. What does that mean?

14 A. I don't know the State language behind it,  
15 I just know that it means I don't have any  
16 evaluation scores for that year.

17 Q. So for the year 2019, 2020, you had no  
18 evaluation?

19 A. It's called partial year exemption.

20 Q. Did you ask for that?

21 A. I think every educator in the state of  
22 Tennessee had an option to do a partial year  
23 exemption that year.

24 Q. And would you do that because you could X  
25 out that score?

1           A.     No.

2           Q.     Did you ask for the partial year  
3 exemption?

4           A.     No. We all were given the option. I  
5 don't remember the exact -- if you had the option  
6 that year, I don't remember. But I know it's a  
7 partial year exemption for that year.

8           Q.     If you have an option, that indicates to  
9 me you can choose whether you want to take it or you  
10 don't want to take it; is that correct?

11          A.     Correct.

12          Q.     And you chose to take the partial year  
13 exemption, correct?

14          A.     I'm not sure if it was a partial year  
15 exemption.

16          Q.     And you can't recall whether or not you  
17 took the partial year exemption?

18                 MR. FOX: Objection to the form.

19                 THE WITNESS: I don't know what you're  
20 saying.

21                 MR. FOX: Mr. Mells, did you say  
22 something? Can't hear you.

23                 THE WITNESS: I don't know what you just  
24 said.

25                 MR. FOX: I just said, objection to the



1 form, and Ms. Steiner might have a response.

2 BY MS. STEINER:

3 Q. Dr. Mells, that's for the Court. If  
4 Mr. Fox makes an objection, you still need to  
5 answer. That's for the Court to look at later,  
6 okay?

7 A. Okay.

8 Q. Could the court reporter read back my  
9 question?

10 (Requested portion of record read.)

11 THE WITNESS: I'm not sure if it was an  
12 option or if we all got partial year exemption.

13 BY MS. STEINER:

14 Q. So do you believe then that it is for the  
15 2019, 2020 school year that all the principals  
16 for -- throughout Metro were given a partial year  
17 exemption, meaning they were not scored on their  
18 performance?

19 A. I don't know.

20 Q. Is that what you mean, though, that if it  
21 was given across the boards, then that nobody was  
22 scored?

23 A. Say that one more time.

24 Q. What do you mean by a partial year  
25 exemption given across the boards, what do you mean

1 by that?

2 A. Because the tornadoes hit and then COVID  
3 hit, we did not have a closeout evaluation.

4 Q. So then there was no evaluations about the  
5 performance of the principals, whether it be grade  
6 school or high school for the spring of 2020,  
7 correct?

8 A. I did not have an evaluation for spring of  
9 2020.

10 Q. Now, did you have an evaluation for the  
11 fall of 2019?

12 A. Yes.

13 Q. What was your score then?

14 A. 3.29.

15 Q. What was the score for your school then?

16 A. There was no score for the school that  
17 year. There was no testing.

18 Q. So for the whole 2019, 2020 school year,  
19 your school was not scored, correct?

20 A. Correct.

21 Q. And the school score, what is the range  
22 typically on that?

23 A. It varies, depending on what you're  
24 speaking about.

25 Q. The one that comes on the evaluation that

1 you get, where it's got your score and it's got  
2 school score, what's the --

3 A. One to five.

4 Q. And is your score, as well, one through  
5 five?

6 A. Yes.

7 Q. And 3.29, how does that rank?

8 A. Just a little bit above expectations.

9 Q. That was for the fall of 2019?

10 A. Correct.

11 Q. Can we have that, could you provide that  
12 to your attorney and we're going to mark that  
13 Exhibit Number 2 to your deposition today.

14 (WHEREUPON, the  
15 previously-mentioned document was  
16 marked as Exhibit Number 2.)

17 THE WITNESS: Say that again?

18 MS. STEINER: Could you provide your  
19 evaluation to Brook Fox? We're going to have that  
20 marked Exhibit Number 2 to your deposition today,  
21 okay?

22 MR. FOX: Brian, is that something you can  
23 e-mail pretty easily?

24 THE WITNESS: I can figure it out. I'm  
25 sure I can.

1           MR. FOX: E-mail to me and I can e-mail it  
2 to opposing counsel and the court reporter, make  
3 sure they have it as an exhibit. That's Number 2?

4           MS. STEINER: Yes.

5 BY MS. STEINER:

6           Q. Now, Dr. Mells, the 3.29, does that  
7 reflect your job performance as the principal at  
8 Madison Middle?

9           A. It's a portion.

10          Q. Okay. What else would be used to reflect  
11 your job performance, other than your score?

12          A. Student academic performance, teacher  
13 panorama data.

14          Q. Let's go back. How did you score for the  
15 2018, 2019 school year?

16          A. Level four.

17          Q. How did you score for the 2017, 2018  
18 school year?

19          A. Level two.

20          Q. And for the 2017, 2018 school year, what  
21 was your position?

22          A. Madison Middle School principal.

23          Q. What does a level two mean?

24          A. Not meeting expectations.

25          Q. Who was your executive director?

1           A.     Oh, boy. Let me take myself back a  
2 minute. You say 2017, 2018?

3           Q.     Yes.

4           A.     That would be Latricia Gloster.

5           Q.     Now 2018, 2019, who was your executive  
6 director?

7           A.     Tracy McPherson.

8           Q.     Did Ms. McPherson resign or retire from  
9 Metro schools; do you know?

10          A.     I believe -- I don't want to be quoted. I  
11 don't know.

12          Q.     Okay. Listen. What is your knowledge  
13 about whether or not Ms. McPherson, why she left  
14 Metro schools?

15          A.     I don't know. She never told me. I don't  
16 know.

17          Q.     Did you ever hear from anybody?

18          A.     No.

19          Q.     So you never heard any reason whatsoever,  
20 under oath, about why Ms. McPherson is no longer at  
21 Metro schools?

22          A.     Possibly retired, possibly resigned.  
23 Don't know which one it was.

24          Q.     Now, when you said you were a level four  
25 for 2018, 2019 school year, do you mean 4.00 was

1 your score?

2 A. That was not my evaluation score, that was  
3 the score that you're referring to, that includes  
4 student data.

5 Q. What was your score for 2018, 2019?

6 A. 4.05.

7 Q. What was your evaluation score for the  
8 2017, 2018?

9 A. 3.10.

10 Q. You said two, what does that mean?  
11 Earlier you said two; what is that?

12 A. That includes student data.

13 Q. What's an override on these scores?

14 A. What scores are you talking about?

15 Q. What can you override the score -- do you  
16 have the ability to toss out the score?

17 A. No.

18 Q. Okay.

19 A. I don't know what that means.

20 Q. What is an LOE score?

21 A. That's the score that includes student  
22 data.

23 Q. What was the -- could we have the 2017,  
24 2018 evaluation for you that we've discussed marked  
25 Exhibit Number 3, and the 2018, 2019 evaluation

1 marked Exhibit Number 4, if you could provide those  
2 to Mr. Fox, Dr. Mells. Is that okay?

3 MR. FOX: No objection.

4 (WHEREUPON, the  
5 previously-mentioned documents  
6 were marked as Exhibit Numbers 3  
7 and 4.)

8 BY MS. STEINER:

9 Q. Now, Dr. Mells, what was your score for  
10 the 2020, 2021 school year?

11 A. Level two.

12 Q. What was your personal score?

13 A. 3.35.

14 Q. Who was your executive director?

15 A. Dr. Chae Snorten.

16 Q. And when you say level two, what was the  
17 two score, what was that score?

18 A. It was including student data.

19 Q. What was it, was it 2.00?

20 A. I gave you the evaluation score.

21 Q. Evaluation score was what, because I'm a  
22 little confused here. What was the evaluation  
23 score?

24 A. 3.35.

25 Q. Is that your score?

1           A.     That's my score.

2           Q.     When you put the students in there, when  
3 you add the student scores in, what's the score?

4           A.     The two.

5           Q.     2.00?

6           A.     Uh-huh.

7           Q.     Is that a yes?

8           A.     Yes.

9           Q.     That's the only thing I'm going to stop  
10 you on, because I understood what you said because I  
11 could see you nodding, but when the court reporter  
12 is trying to type it up for the record, she can't  
13 understand it. We won't be able to understand it  
14 later, so any time you do that, I'm going to stop  
15 you and say, is that a yes or is that a no, for the  
16 record, okay?

17          A.     Yes.

18          Q.     Now, let's have your 2020 through 2021  
19 evaluation marked the next-numbered exhibit.

20                 MR. FOX: No objection.

21                         (WHEREUPON, the  
22                                 previously-mentioned document was  
23                                 marked as Exhibit Number 5.)

24         BY MS. STEINER:

25           Q.     Can you tell me why the student scores



1 pulled it down to a two?

2 A. This was virtual school. We would have  
3 students taking a test virtually and in-person,  
4 bringing the students in. It was that COVID year.

5 Q. So then you had difficulty with the scores  
6 because the kids were taking the testing remotely?

7 A. You had students taking the tests  
8 in-person who had never been in the building before,  
9 because they had the option of being remote, and so  
10 some students attended class, students didn't attend  
11 class, so test scores did plummet -- they didn't  
12 plummet, test scores did better than pass, but they  
13 did not do as well.

14 Q. That's because the kids were coming back  
15 into the school?

16 A. We were hybrid last year, so you had some  
17 in the building, some not in building.

18 Q. Did the kids do better when they were in  
19 the building or when they were remote?

20 A. On?

21 Q. Testing?

22 A. Not at White's Creek, but probably in  
23 other schools, yes.

24 Q. They did better testing remotely?

25 A. Our test scores at White's Creek went up

1 the last school year compared to the time they were  
2 tested.

3 Q. So last time they were tested?

4 A. The last year was what, 2020, 2021, so  
5 2019, 2020. Was it 2018, 2019; is that right?

6 Q. Now --

7 A. Yeah, 2018, 2019.

8 Q. The 2.0, the 2.00, does that include your  
9 evaluation score of 3. --

10 A. You faded out.

11 Q. Does the 2.00 take into contract your  
12 score of 3.35?

13 A. Yes.

14 Q. And so then if you have your 3.35 in  
15 there, you have to have -- you're the math major,  
16 you have to have something to counteract that to  
17 have the average be 2, correct?

18 A. Correct.

19 Q. What's counteracting your 3.35?

20 A. I would have to go back in and look to  
21 determine that.

22 Q. It has something to do with the scores,  
23 though, correct?

24 A. Correct.

25 Q. So then the scores would have to be, to

1     come out 2.00, the scores would have to be somewhere  
2     around 1.65, correct?

3             A.     Not necessarily.

4             Q.     But that's the math results, correct?

5             A.     I don't know if it's 1.65 or not. I can't  
6     say correct.

7             Q.     But you had something that would have been  
8     lower than 2 with regard to the scores to have the  
9     average be 2, correct?

10            A.     Correct.

11            Q.     So you've got your 3.35 added into some  
12     other figure that ends up being 2, correct?

13            A.     Correct.

14            Q.     And what is your understanding about why  
15     Dr. Bailey was removed from White's Creek?

16            A.     I did not have any conversations about  
17     that.

18            Q.     Were you at Metro schools, and I know you  
19     were, when the issue arose about Dr. Battle's  
20     brother, Coach Battle?

21            A.     Yes.

22            Q.     What do you recall about that?

23            A.     That was an incident between Dr. Battle's  
24     brother and a parent.

25            Q.     What type of an incident?

1           A.     Alleged that there was physical  
2     altercation.

3           Q.     And what is your belief about what you  
4     heard?

5           A.     I don't have one. I wasn't there.

6           Q.     Do you know Dr. Battle? Do you personally  
7     know her?

8           A.     I wouldn't say personally. I know her as  
9     director of schools.

10          Q.     Do you know Coach Battle?

11          A.     Say that one more time.

12          Q.     Coach Battle?

13          A.     Yes. I know him as a coach. He's a  
14     coach.

15          Q.     How long have you known Coach Battle?

16          A.     Whenever he became the coach of White's  
17     Creek, I don't know what year, but that's my first  
18     time meeting him.

19          Q.     How did you meet him if you were at  
20     Madison? Did you go to --

21          A.     I was at Pearl Cohn when I met him.

22          Q.     Okay. Did you get along well with Coach  
23     Battle?

24          A.     Yeah. We didn't have any interactions  
25     outside of when I would have to work the games at

1 White's Creek.

2 Q. Are you aware of the -- hang on one  
3 second. See if I can find this. I am not still  
4 sharing the screen, am I? I'm going to -- when we  
5 break, I'm going to pull this document out and I  
6 want to ask you about something.

7 Were you aware that Coach Battle was  
8 nonrenewed by Dr. Bailey at White's Creek?

9 A. No.

10 Q. No?

11 A. No.

12 Q. Did you see any of the disputes that arose  
13 about Coach Battle and whether or not he should be  
14 removed from White's Creek?

15 A. The dispute? Could you clarify what  
16 disputes?

17 Q. The Facebook posts or any of the issues  
18 that arose at the school board meetings about Coach  
19 Battle?

20 A. No Facebook posts.

21 Q. Okay. Have you ever gone out to dinner or  
22 lunch with Coach Battle?

23 A. No.

24 Q. Did you know that Coach Battle was trying  
25 to be hired back at Metro schools?

1 A. No.

2 Q. Do you know where Coach Battle is now?

3 A. I believe he's a basketball coach at a  
4 private or charter school, private or charter, I  
5 don't know which one.

6 Q. When's the last time you saw Dr. Battle?

7 A. Dr. Battle?

8 Q. Coach Battle.

9 A. I don't know.

10 Q. Was it within the past month?

11 A. No.

12 Q. Past year?

13 A. No, I don't think so.

14 Q. Have you ever had any conversations with  
15 Coach Battle -- with Dr. Battle about her brother?

16 A. No.

17 Q. Do you know what your evaluation score is  
18 for this school year?

19 A. No. Well, I mean, for the first semester,  
20 but we don't have it yet.

21 Q. What was the score for your first  
22 semester?

23 A. 4.07.

24 Q. What was the school score?

25 A. Students haven't been tested.

1 Q. Who is your executive director for this  
2 year?

3 A. Dr. Chaerea Snorten.

4 Q. I'd like that evaluation marked the  
5 next-numbered exhibit.

6 (WHEREUPON, the  
7 previously-mentioned documents  
8 were to be marked Late-filed  
9 Exhibit Number 6.)

10 MR. FOX: No objection.

11 BY MS. STEINER:

12 Q. Dr. Mells, do you know how these students  
13 have scored for the 2021, 2020 school year?

14 A. Repeat that again.

15 Q. Do you know how the students have scored  
16 for the 2021, 2022 school year?

17 A. Scored as compared to what?

18 Q. How they have scored for this report card  
19 type deal, the evaluation, do you know what their  
20 scores are going to be?

21 A. Yes.

22 Q. What?

23 A. That would be -- I would have to go find  
24 that information for you. I don't have that off the  
25 top of my head.

1           Q.    Do you know approximately how they are  
2 going to score? Can you give me an approximate  
3 amount?

4           A.    No, I can't.

5           Q.    Is it 2.0, is it 3.0, is it 1.0, do you  
6 have any idea?

7           A.    It's not -- the scores don't come like  
8 that.

9           Q.    Well, there's some score that you've been  
10 telling me about that you got a 2.0 last year,  
11 correct? What is that score called?

12          A.    Let me see what was selected the last  
13 school year. School composite.

14          Q.    What is the school composite for this year  
15 going to be?

16          A.    I don't know.

17          Q.    Is it true that you cannot figure that out  
18 until you actually get the scores back from the  
19 State?

20          A.    Correct.

21          Q.    So anything that you could give me today  
22 would just be a guess, correct?

23          A.    Correct.

24          Q.    Now, do you think White's Creek will stay  
25 a priority school?



1 A. No.

2 Q. Do you think you're getting out of  
3 priority status?

4 A. Possibly.

5 Q. Who has told you that? Who's told you  
6 that, that you're going to get out of priority  
7 status?

8 A. No one.

9 Q. The State lists priority schools, and  
10 you're telling me that you believe White's Creek is  
11 getting out of priority status?

12 A. We have the potential to do that.

13 Q. Now, do you know how long White's Creek  
14 was in priority status?

15 A. I don't know what year the list came out.

16 Q. When you say that, what do you mean by  
17 that, you don't know the year the list came out?  
18 Was it possible that priority status did not exist  
19 in previous years, is that what you're saying?

20 A. The list comes out on a cycle.

21 Q. How long has the designation priority  
22 schools existed that you know of?

23 A. I don't know.

24 Q. Was it in existence the whole time you've  
25 been at Metro schools?

1 A. Yes.

2 Q. So that would be from at least 2006, 2008  
3 through the present date, correct?

4 A. Correct.

5 Q. Okay. Now, is Robert Miller -- is that a  
6 high school?

7 A. No.

8 Q. Do you know of any middle school  
9 principals who lost their job because the school was  
10 in priority status?

11 A. I don't know, no.

12 Q. Do you know of any high school principals  
13 who lost their job because the school was in  
14 priority status?

15 A. I don't know.

16 Q. Were you told by anybody that Dr. Bailey  
17 lost his job for job performance?

18 A. No.

19 Q. Do you know why Dr. Bailey is no longer at  
20 White's Creek?

21 A. No.

22 Q. Did you ever work with Dr. Bailey?

23 A. We were colleagues.

24 Q. Did you think that your -- did you think  
25 Dr. Bailey was a good principal?

1 A. I don't know.

2 Q. Did you think he was professional?

3 A. Say again.

4 Q. Did you think he was professional?

5 A. Did I think he was professional?

6 Q. Yes.

7 A. Yes.

8 Q. Did you think he was honest?

9 A. I don't know.

10 Q. Okay. If there is an issue with your job  
11 performance -- are you tenured?

12 A. Yes.

13 Q. How long have you been tenured?

14 A. I don't know.

15 Q. Do you know whether or not Metro schools  
16 has the legal ability to just nonrenew your contract  
17 if you're tenured?

18 A. I don't know.

19 Q. Okay. If there is an issue with your job  
20 performance, do you know whether or not your  
21 supervisor is supposed to address that issue with  
22 you?

23 A. Repeat the question.

24 Q. If there is an issue with your job  
25 performance, should your supervisor address that

1 with you, bring it to your attention?

2 A. Should they, or do they?

3 Q. Both.

4 A. I didn't hear what you asked.

5 Q. If there is an issue with your job  
6 performance, you're not doing your job right, should  
7 your supervisor bring that to your attention?

8 A. Yes.

9 Q. Okay. Are you familiar with something  
10 called a performance plan?

11 A. Yes.

12 Q. Is that -- have you ever been on one?

13 A. No.

14 Q. Do you know whether or not the supervisor  
15 is responsible for putting you on a performance plan  
16 if there are issues with your job performance?

17 A. The supervisor is responsible.

18 Q. Do you know if that's being done with the  
19 hopes that whatever the problem is will correct  
20 itself?

21 A. I don't know.

22 Q. Were you contacted by anyone about whether  
23 or not Dr. Bailey could be transferred into any  
24 school that you were principal of?

25 A. No.

1           Q.    Okay.  Do you still have your teaching  
2 license?

3           A.    Yes.

4           Q.    Do you have your administrators license?

5           A.    Yes.

6           Q.    So you have all the licenses still intact,  
7 correct?

8           A.    Yes.

9           Q.    Were you aware that some of the principals  
10 let their teaching license -- that don't need it  
11 anymore so they don't keep that up?

12                   MR. FOX:  Objection to the form.  (Court  
13 reporter asks for clarification.)

14                   THE WITNESS:  Aware of the license?  I was  
15 not aware that principals let their license go.

16                   MS. STEINER:  Let's take about five  
17 minutes, is that okay?  I'm about ready to end,  
18 okay?

19                           (Brief break observed.)

20 BY MS. STEINER:

21           Q.    Ready?

22           A.    Yes.

23           Q.    Dr. Mells, when you were at -- and you  
24 were at Madison Middle School before White's Creek,  
25 correct?

1 A. Correct.

2 Q. When you were at Madison Middle or White's  
3 Creek or Pearl Cohn, did anyone ever tell you that  
4 they were going to nonrenew you for job performance?

5 A. No.

6 Q. Did anyone ever discuss with you your job  
7 performance and counsel with you to tell you that  
8 your job performance was not up to par?

9 A. No.

10 Q. Did anyone ever put you from Pearl Cohn  
11 through White's Creek on a performance plan?

12 A. No.

13 Q. Do you know what a nonrenewal is?

14 A. Yes.

15 Q. What is a nonrenewal?

16 A. It depends. There's a nonrenewal meaning  
17 that you will not be in your position for the  
18 upcoming school year.

19 Q. Does nonrenewal mean you've lost your job  
20 at Metro schools?

21 A. It means you have been displaced in your  
22 current school.

23 Q. Displaced? Does that mean you've got a  
24 job for next year?

25 A. It depends on the nonrenewal.

1 MR. FOX: Objection to the form.

2 BY MS. STEINER:

3 Q. Explain to me the different types of  
4 nonrenewals that you have?

5 A. There is a nonrenewal for rehire;  
6 nonrenewal, not eligible for rehire.

7 Q. And those are the two you're aware of,  
8 correct?

9 A. Correct.

10 Q. Okay. And is the person told that they  
11 are nonrenewed whether or not they are eligible or  
12 not eligible for rehire?

13 A. Yes.

14 Q. Nonrenewal is not the same as a transfer,  
15 correct?

16 A. Correct.

17 Q. Now, a second ago when you said -- when  
18 you said that you anticipate that White's Creek, and  
19 I may have gotten your words a little off on that,  
20 you anticipate White's Creek would be renewed from  
21 priority status, is that -- do you have some data to  
22 support that, or is that your hope as an educator?

23 A. My hope.

24 Q. Gotcha. Have you talked to anyone about  
25 giving your deposition today, other than counsel?

1           A.     I had to tell my supervisor so she would  
2 know I would be out of the building.

3           Q.     That would be Ms. Snorten -- Dr. Snorten?

4           A.     Yes.

5           Q.     And do you know of any high school  
6 principals who have been nonrenewed for job  
7 performance?

8           A.     I don't know. Don't know.

9           Q.     Who is your assistant principal?

10          A.     Melissa Brooks.

11          Q.     How long has she been an assistant  
12 principal?

13          A.     I'm sorry?

14          Q.     How long has she been an assistant  
15 principal at White's Creek?

16          A.     Two years.

17          Q.     Who was the assistant principal before Ms.  
18 Brooks?

19          A.     They were -- they were before me.  
20 Jeremiah -- I can't think of Jeremiah's last name.  
21 That was the only one that was here before Ms.  
22 Brooks.

23          Q.     Was Madison Middle School priority?

24          A.     Yes.

25          Q.     That is all, Dr. Mells.



1           A.     Okay.

2                   MS. HARBISON:   Nothing from me.

3                   MR. FOX:   Nothing from Metro.   Thank you,

4   Dr. Mells.

5                   FURTHER THIS DEPONENT SAITH NOT

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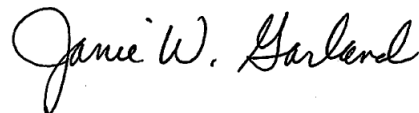
## REPORTER'S CERTIFICATION

STATE OF TENNESSEE       )  
COUNTY OF DAVIDSON       )

I, Janie W. Garland, LCR#111, licensed court reporter, in and for the State of Tennessee do hereby certify that the above deposition was reported by me via remote means and that the foregoing pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number following my name below.



Janie W. Garland, LCR#111

E R R A T A P A G E

I, Brian Mells, having read the foregoing deposition, Pages 1 through 47, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

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Brian Mells

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